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U.S. Application No. 09/995,648 Art Unit 2131  
Submission of Amendment with RCE in Response to Response to September 8, 2005 Final Office Action

### REMARKS

In response to the final Office Action dated September 8, 2005, the Assignee respectfully requests continued examination and reconsideration based on the above claim amendments and the following remarks. The Assignee respectfully submits that the pending claims distinguish over the cited documents.

Claims 1-30 are pending. Claims 1, 2, 9, 11-13, 15, 19, and 22-24 were rejected under 35 U.S.C. § 102 (e) as being anticipated by Published U.S. Patent Application 2001/0037361 to Croy. Claims 3-8, 10, 14, 16-18, 20-21, and 25-30 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over *Croy*. The Assignee shows, however, that the amended claims are neither obviated nor anticipated by the cited documents. The Assignee thus respectfully submits that the pending claims distinguish over the cited documents.

### Rejection of Claims under 35 U.S.C. § 102

Claims 1, 2, 9, 11-13, 15, 19, and 22-24 were rejected under 35 U.S.C. § 102 (e) as being anticipated by Published U.S. Patent Application 2001/0037361 to Croy. A claim is anticipated only if each and every element is found in a single prior art reference. *See Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q. 2d (BNA) 1051, 1053 (Fed. Cir. 1987). *See also* DEPARTMENT OF COMMERCE, MANUAL OF PATENT EXAMINING PROCEDURE, § 2131 (orig. 8<sup>th</sup> Edition) (hereinafter "M.P.E.P."). As the Assignee shows, the amended claims patentably distinguish over *Croy*. The reference to *Croy* does not anticipate the claims, so the Assignee respectfully requests that Examiner Abrishamkar to remove the 35 U.S.C. § 102 (e) rejection.

The claims have been amended. These claims describe stored validation rules. The validation rules comprise at least three hierarchically organized views, with each view utilizing an execution sequence of validation methods. Each execution sequence designates an order of

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execution for the validation methods, and each validation method compares validation values to the data. Amended claim 1, for example, is reproduced below.

1. (Currently Amended) A client-server computer system for use with web-based applications comprising:

a computer system running one or more web browsers capable of processing web forms;

a web server capable of processing Java code and web-based forms;

a storage mechanism coupled to said computer system, wherein said web server is used for validating data with information compiled from said storage mechanism; and

validation rules stored in said storage mechanism, the validation rules comprising at least three hierarchically organized views, with each view utilizing an execution sequence of validation methods;

wherein each execution sequence designates an order of execution for the validation methods; and

wherein each validation method compares validation values to the data.

Independent claims 12, 22, and 23 recite similar features.

The published application to *Croy* does not anticipate the claims. *Croy* is completely silent to "each execution sequence designat[ing] an order of execution for the validation methods, and each validation method compare[ing] validation values to the data." *Croy* is also silent to the amended dependent claims. Because *Croy* is silent to all these features, the patent to *Croy* cannot anticipate the claims. The Assignee, then, respectfully requests that Examiner Abrishamkar remove the § 102 rejection.

#### **Rejection of Claims under 35 U.S.C. § 103 (a)**

Claims 3-8, 10, 14, 16-18, 20-21, and 25-30 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over *Croy*. If the Office wishes to establish a *prima facie* case of obviousness, three criteria must be met: 1) combining prior art requires "some teaching, suggestion, or motivation to do so found either in the references themselves or in the knowledge

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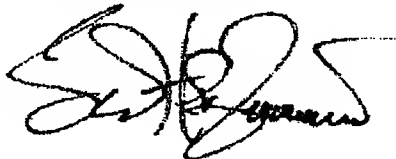
generally available to one of ordinary skill"; 2) there must be a reasonable expectation of success; and 3) all the claimed limitations must be taught or suggested by the prior art. DEPARTMENT OF COMMERCE, MANUAL OF PATENT EXAMINING PROCEDURE, § 2143 (orig. 8<sup>th</sup> Edition) (hereinafter "M.P.E.P.").

The dependent claims are not obvious. These claims are dependent upon their respective base claims and, therefore, incorporate the same distinguishing features. Moreover, all these claims additionally recite features that are not taught or suggested by *Croy*. Claims 3 and 14, for example, recite the "validation rules type cast a single value integer." Claim 4 recites "the validation rules type cast an integer as a string." Claim 5 recites "the validation rules change legacy data to string values." Claim 6 recites "the validation rules change the legacy data to check for membership in a data set." Claim 7 recites "the validation rules validate an entire set of data." Claim 8 recites "the validation rules return individual validation statuses in a hash table." Claim 10 recites "each validation rule includes an associated application tag that differentiates versions of an application." Because *Croy* fails to teach or suggest these features, one of ordinary skill in the art would not consider these claims obvious over *Croy*. The Assignee thus respectfully requests that the § 103 rejection be removed.

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If any questions arise, the Office is requested to contact the undersigned at (919) 387-6907 or [scott@wzpatents.com](mailto:scott@wzpatents.com).

Respectfully submitted,



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